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June 27, 2014

BY ELECTRONIC FILING

Hon. Henry Pitman
United States District Court – Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *Sea Trade Maritime Corp., et al. v. Stelios Coutsodontis, et al.*
Case No. 09-cv-488 (LGS)(HBP)

Dear Judge Pitman:

As the Court is aware, my firm was recently retained to represent Plaintiffs in this matter. We are writing to request a pre-motion discovery conference pursuant to the Court's Individual Practices, Rule 2A, and Local Civil Rule 37.2.

In short, it is Plaintiffs' position that Defendants Stelios and Francesca Coutsodontis (the "Defendants") failed to produce documents that were requested of them in accordance with a March 20, 2014 Scheduling Order issued by the Court. Specifically, on April 17, 2014, Plaintiffs served Defendants with a request for documents. The return date for the production of these documents was May 19, 2014, eleven days before the May 30, 2014 deadline for the end of fact discovery. These documents were never produced.¹ The undersigned has conferred with Defendants' counsel about this outstanding request, but counsel has refused to produce these documents at this time.

Plaintiffs respectfully request that the Court order a pre-motion discovery conference to address the production of these outstanding documents. If an agreement is not reached at such a conference, Plaintiffs will ask the Court's permission to permit Plaintiffs to move the Court to compel Defendants to produce said documents.

¹ On July 22, 2009, Plaintiffs also served Defendant Stelios Coutsodontis with a notice of deposition, request for interrogatories, and request for production of documents (Docket Entry No. 14). These requests were made prior to the Court imposing a discovery schedule. Nonetheless, these requests were also never complied with.

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We thank the Court in advance for its consideration in this matter.

Respectfully,

/s/ Jason H. Berland

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